

REMARKS

Claims 1, 3-15, and 17-37 are pending and stand rejected. Reconsideration of the claim rejections is requested.

Claim Rejections - 35 U.S.C. §103

Claims 1, 3-15, and 17-37 are rejected as being unpatentable over Erickson in view of Murthy. Applicants respectfully traverse the rejection and contend that at the very least, claims 1, 15, 26, and 37 are patentable over the combination of Erickson of Murthy. In particular, by way of example, the combination of Erickson of Murthy does not disclose methods for generating autonomous persistent storage systems based on *an entity definition for a persistent storage structure, which comprises a declaration of an object, one or more properties of the object, and a data type for each property*, wherein the *entity definition is parsed to determine logical structures and properties for declared entities*, and wherein *the persistent storage structure is automatically created based on the determined logical structures and properties of the declared entities*, as essentially claimed in claims 1, 15 and 26.

The Office Action states that Erickson discloses a process of automatically generating a persistent storage structure using an entity definition (Col. 4, lines 34-39) and automatically generating an interface to access the persistent storage medium (Col. 4, lines 63-66). This assertion is technically and legally erroneous. Erickson clearly discloses in Col. 4, lines 34-39 an EncoderDecoder (310) function that is used to reformat object instance data of an object from an internal storage format to a format that complies with a predefined persistent storage format (see, Col. 4, lines 28-33 and Col. 5, line 10-29). This cited passage of Erickson undoubtedly does not disclose a process for generating *a persistent storage structure by*

parsing an entity definition for the persistent storage structure, which comprises a declaration of an object, one or more properties of the object, and a data type for each property, to determine logical structures and properties of the declared entities that are used for automatically generating the persistent storage structure, as contemplated by the claimed inventions, but rather storing object data instances in a format that fits to a predefined persistent storage structure. The Examiner's characterization of the teachings of Erickson is simply patently erroneous as applied to the claimed invention.

The Examiner erroneously maintains that Erickson teaches in Col. 4, lines 32-41) an EncoderDecoder function that reformats object instance data and generates a persistent storage based on the reformatting. However, the Examiner does not seem to understand that the cited passage relates to a process of reformatting object instance data from one format (an internal object storage format) to another format that can be written to a persistent storage medium. Again, this process relates to a storage process of storing objects to a compatible format. The Examiner is technically mistaken that such passage relates to, or can otherwise be construed as, a process of actually generating a persistent storage medium based on logical structures and properties of declared entities that are determined based on parsing of an *entity definition*, within the context of the claimed inventions.

Most specifically, the Examiner erroneously characterizes Col. 4, lines 32-41 of Erickson as teaching a process that "generates a persistent storage based on reformatting." Indeed, reformatting an object to fit to an existing data storage format is undoubtedly much different from generating a persistent storage structure. It is incumbent on the Examiner to explain with specificity the basis for his finding that Col. 4, lines 32-41 of Erickson teaches a process of generating a persistent storage structure. There is simply no reasonable basis for

the Examiner to broadly construe the claimed inventions in light of the specification in a way that reads on the teachings of Erickson in Col. 4, lines 24-31, as erroneously relied on to support the rejections.

The claims were previously amended for the sole purpose of clarify the subject matters over the cited art of record, where it is clear that the cited passages of Erickson as relied on by the Examiner do not teach a process of automatically generating a persistent storage medium based on logical structures and properties of declared entities that are determined based on parsing of an *entity definition for the persistent storage structure, which comprises a declaration of an object, one or more properties of the object, and a data type for each property*, as essentially recited in claims 1, 15, 26 and 37. The Examiner's reliance of the previous cited references is improper as a matter of fact and law.

Accordingly, for at least the above reasons, claims 1, 15, 26 and 37, and all pending claims that depend from such claims are patentable over the combination of Erickson of Murthy. The rejections should be withdrawn.

Submitted,

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